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ABSTRACT

This paper, presented by the Council of Ontario Universities (COU), addresses questions related to development of the Quality Assessment Board, the applied degree pilot project, new Ontario-based private institutions, and new taxpayer and student protection measures. The COU highlights four major points in their response to the paper, "Increasing Degree Opportunities for Ontarians." First, quality reviews for degree programs offered by private institutions should be rigorous and maintain current quality standards for Ontario. Second, no public subsidies should be paid to private institutions. Third, the application for degree-granting status and the conduct of the reviews should be procedurally transparent. Last, the standards for college Applied Degrees should be different from those for university degrees. Also discussed in this paper, the Council responds to the Minister's specific questions regarding the QAB, the Applied Degree Pilot Project, new Ontario-based private institutions, and new taxpayer and student protection measures. One appendix outlines the Middle States Association Standards for Accreditation. (HB)

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INCREASING DEGREE OPPORTUNITIES FOR ONTARIANS

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June 2, 2000

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COU RESPONSE TO THE MINISTER REGARDING THE CONSULTATION PAPER: *INCREASING DEGREE OPPORTUNITIES FOR ONTARIANS*

Preamble:

In addition to the specific responses to the questions posed in the Minister's consultation paper, *Increasing Degree Opportunities for Ontarians*, COU wishes to stress four key points in its response:

- **The quality reviews should be rigorous**

  Quality reviews for degree programs offered by private institutions should be rigorous and maintain the current quality standards for Ontario.

- **No public subsidies should be provided to private institutions**

  The Minister has indicated that private institutions offering degrees will not be eligible for capital or operating funding. COU would like underscore the importance of ensuring that public funds not be diverted away from the publicly-funded system to support private institutions.

- **The application for degree-granting status and the conduct of the reviews should be procedurally transparent**

  All applications to the Quality Assessment Board (QAB) should be made public and considered at a public hearing prior to approval. Results of the reviews and rationale for decisions should also be made public.

- **The standards for college Applied Degrees should be quite different from those for university degrees.**

  Most notably, no research role should be required of faculty who teach Applied Degrees offered by Ontario's colleges.

A. QUALITY ASSESSMENT BOARD

1. What essential qualities or qualifications should the Board Chair and membership have? How many members would be appropriate? What constituencies should be represented? How can conflict of interest be avoided?

   - The Chair of the Board should be a knowledgeable and credible individual able to facilitate consensus among the various perspectives of Board members.
   - The Board should be comprised of approximately 12 members including industry, university, college, MTCU and student representatives. (Alberta's Applied Degree Evaluation Committee included a similar number and combination of representatives.)
   - Given their significant expertise in the area of degree education in Ontario, at least two university representatives should be members of the Board.
   - COU could consult with its members and nominate university representatives.

2. Should there be a relationship between the Board's assessment and other accreditation or appraisal processes? If so, what should be the nature of that relationship?

   - The Board's role should be distinct from that of the "expert evaluators" (those in the field, see below). The Board should establish standards, criteria and the review process while the expert evaluators should conduct the reviews and provide advice to the Board.
   - Proposed new undergraduate programs offered by private institutions should undergo a cyclical undergraduate program review (like that mandated and audited by the Undergraduate Program Review Audit Committee [UPRAC]) as is the case for Redeemer College.
   - For graduate programs, an appraisal process with the same standards and rigour as Ontario Council on Graduate Studies (OCGS) would need to be put in place to maintain the current Ontario standard. There is a precedent for providing OCGS appraisal services to non-member institutions. RMC (a federally-funded institution) currently contracts OCGS to conduct its graduate programs reviews. The QAB could also contract OCGS to conduct graduate program reviews for private and/or out-of-province institutions.
   - For proposed professional and quasi-professional programs, the Board should consult with the relevant regulatory and other professional bodies regarding the academic quality and economic need for program graduates.

3. What essential academic standards would you recommend for the Board's use?

- OCGS periodic appraisals lead to a classification of Good Quality if the program's objectives are appropriate and are being met; the core faculty provide intellectual leadership in the disciplinary area(s) of the program through active engagement in research and scholarship; the faculty complement is appropriate for the level and scope of the program and its identifiable fields, and there are appropriate provisions and/or plans for its continuing vitality; the curriculum design is appropriate; the resources, such as laboratories, libraries, computer facilities, and research support, are appropriate; enrolments are commensurate with the resources available; students complete the program in a timely fashion; there is evidence of appropriate financial support for students; and there is demonstration of the quality of the educational experience of students, including intellectual development and the acquisition of relevant skills.

4. What standards are required to ensure that the name of the degree and the name of the academic institution accurately reflect the nature of the education that is being offered?

- For graduate programs, comments regarding program nomenclature (program name and degree designation) should be sought from OCGS regarding the name of the degree and the curriculum and requirements of the proposed new programs.
- For proposed professional and quasi-professional programs, the Board should consult with the relevant regulatory and other professional bodies regarding the academic quality and societal need for program graduates.
- As in Alberta, the Board should circulate proposed applied degree programs to other postsecondary institutions for comment. The request for comments should include comments regarding program nomenclature.

5. What institutional standards are essential in assessing the readiness or capacity of an institution to offer a program leading to a degree?

Examples from two other jurisdictions should be considered:

a) In Alberta, there are two bodies that are involved in the assessing academic programs leading to a degree:

i) The Private Colleges Accreditation Board in Alberta has been given powers to determine minimum standards for the approval of programs of study leading to a bachelor's degree that may be granted by the private colleges in Alberta, to establish and implement procedures for the consideration of applications by private colleges to offer such programs, and to establish procedures for the periodic evaluation of approved programs that have been accredited. Programs submitted to the Board must meet the following:

- Appropriate curriculum
- Sufficient number of suitably qualified (PhD or equivalent and actively engaged in research) faculty members
- Appropriate learning and library resources
- Sufficient financial resources available to support the program

ii) Applied Degree Evaluation Advisory Committee in Alberta was established "to make recommendations to the Minister on the ability of a new credential, the applied degree, to prepare Albertans for careers in a rapidly changing economy." All of the institutions that received approval to offer applied degree programs met standards related to program structure, subject area, protection of other credentials and evaluation plans.

b) The Middle States Accreditation Board in the US accredits institutions based upon the results of an institutional self-study and an evaluation by a team of peers and colleagues assigned by the Commission. Accreditation attests that the institution has met the following criteria:

- That it is guided by well-defined and appropriate goals
- That it has established conditions and procedures under which its goals can be realized
- That it has accomplished its goals substantially
- That it is effectively organized, staffed, and supported
- That it can be expected to continue to accomplish its goals and,
- That it meets the standards (see Appendix 1) of Middle States Association Commission on Higher Education

We would also recommend that such institutions be required to meet the same student assistance requirements as publicly-assisted universities (i.e. set aside a minimum of 10% of its tuition revenue up to $4,500 of tuition and 30% of any tuition increment above that amount for student assistance). Such a requirement will ensure the private university is fulfilling its societal obligations.

6. Should the Government establish an appeals mechanism to allow for appeals about the Board's process or findings?

   - The review process should be iterative.
   - Applicants should be provided with a written rationale for the decision.
   - Experience from the OCUA/AAC and OCGS processes suggest that providing institutions with the opportunity to re-apply can provide a sufficient alternative to a formal appeals process.

7. Should the QAB recommendations include a time limit for approvals, requiring follow-up reviews (e.g., every 5 years)?

   - Middle States Accreditation Board in the US accredits institutions for 5 years.
   - The OCGS appraisal process requires periodic re-appraisal of graduate programs on a 7 year cycle.
   - The approvals granted by the QAB should be of a similar duration.

B. APPLIED DEGREE PILOT PROJECT

1. What academic standards should be used by the Quality Assessment Board to assess applied degree pilot project proposals?

   - As in Alberta, applied degree programs offered by Ontario's colleges should have a unique structure and focus that distinguishes them from university degrees. They should focus on the attainment of clearly identified competencies, should be employment oriented and should not duplicate existing university degrees.
   - Applied Degrees offered by Ontario's colleges should be regarded as a terminal degree.

2. What institutional standards should be used by the Quality Assessment Board to assess the readiness or capacity of a college to offer a program leading to an applied degree? Should the standards be the same as those applied to new privately funded organizations?

   - All institutions that receive approval to offer applied degrees should have met standards related to program structure, subject area, distinction from other credentials, and evaluation plans.

   - **As in Alberta, there should be no research role required of faculty who teach these programs.**[1]

3. What standards should be used to assess economic need for an applied degree program?

   - The following standards should be used:

   - **Should meet an unmet economic need. (Not duplicative of existing university programs)**

   - Strong employment focus

   - Demonstrated labour market demand

   - Industry support for the provision of paid work experience

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[1] **It is interesting to note that in Alberta the importance of not creating more universities was made very explicit:**

> **"It is not the intention of the project to create more universities. Public colleges and technical institutes offering applied degree programs will not become universities, nor will they confer degrees in traditional university programs. Research will not become part of the general mandate of the institutions delivering applied degrees"(taken from Frequently Asked Questions about Alberta's Applied Degrees).**

4. How should applied degrees be structured? Should a work component be required? Should there be a diploma exit option?

   - The Applied degree programs offered by Ontario's colleges should be 4 years (6 semesters of formal instruction and two semesters of formally credited work experience).

   - In order to confirm that the diploma is still a viable credential, a diploma exit option should also normally be offered.

5. What should the admission standards for college applied degrees be?

   - College admission standards should apply for degrees offered by the colleges.

6. What should degrees from colleges be called?

   - In an effort to avoid confusion for students and employers that has developed in Alberta regarding the difference among degree credentials offered by various post-secondary institutions, the name of the applied degrees offered by Ontario's colleges should be distinct in two ways:

     1. The degree should be called Applied Degree (ApD) in [Subject Specialization]. The term Bachelors or Baccalaureate should not be employed.

     2. the subject specialization should be highly specific and provide a full description of the distinct nature of the subject field

C. NEW ONTARIO-BASED PRIVATE INSTITUTIONS

1. Should there be any restrictions on the range of programs that private institutions can offer?

   - A graduate research degree should not be approved by the QAB unless the institution applying for the degree provides students enroled in the program with research (library and laboratory) facilities. Suggesting usage of a publicly-funded university's facilities should not be sufficient. Furthermore, the students should

be taught and supervised by faculty that are actively engaged in research. (These are criteria that are considered under the OCGS process.)

- Degree programs offered by private institutions should not be duplicative of existing university degree programs. If, however, that is not adopted, then public institutions should be able to compete on the same basis.

2. What tests of institutional capacity are most important to assess the ability of new degree-granting institutions to offer degree programs, e.g., faculty, library resources?

- Appropriate curriculum
- Sufficient number of suitably qualified (PhD or equivalent and actively engaged in research and scholarship) faculty members
- Appropriate learning and library resources
- Sufficient financial resources available to support the program

3. What academic standards should be used by the QAB to assess new degree programs?

- See response to A.3.
- For graduate programs, an appraisal process with the same standards and rigour as OCGS would need to be put in place to maintain the current Ontario standard. There is a precedent for providing OCGS appraisal services to non-member institutions. RMC (a federally-funded institution) currently contracts OCGS to conduct its graduate programs reviews. The QAB could also contract OCGS to conduct graduate program reviews for private and/or out-of-province institutions.
- Undergraduate programs offered by private institutions should undergo a cyclical undergraduate program review (like that mandated and audited by UPRAC) as is the case for Redeemer College.

D. NEW TAXPAYER AND STUDENT PROTECTION MEASURES

1. What is the best mechanism for ensuring protection for students in the event that a private institution ceases operations?

    - It is clear there must be adequate safeguards to protect the interest of Ontario taxpayers and students. To accomplish that objective we urge the following legislative and/or regulatory requirements.

        - A financial instrument to secure, at a minimum, students' tuition in the event of institutional closure. Such an instrument would also guarantee enough funding to allow the student to complete his/her program recognizing that such programs may be three or four years in length.

        - Annual "public" reporting of enrolment and institutional finances according to commonly accepted accounting and auditing procedures and policies.

        - The establishment of appropriate administrative systems to ensure compliance with MTCU reporting requirements.

        - Governance structures that recognize the important role of faculty, staff and students in the work of the institution.

    - In addition to the above, the existence of rigorous quality reviews and appropriate standards will ensure that institutions will have a good opportunity to deliver successful programs.

2. Should the government establish a sector-funded compensation pool? Should that pool include private vocational schools?

    - As a minimum, consideration should be given to applying similar mechanisms and provisions as those in place for the Private Vocational Schools in Ontario.

    - Alternatively, fees from the reviews could be used to fund a compensation pool.

    - As noted previously, the use of a financial instrument should be considered to ensure Ontarians and students are protected from the effects of institutional bankruptcy.

3. Should the government require a teach-out provision for all new degree- granting institutions? Are there measures of operational soundness which the government could apply to distinguish which institutions may require a teach-out provision and which may not?

   - As a minimum, consideration should be given to applying similar mechanisms and provisions as those in place for the Private Vocational Schools in Ontario

4. What is the best means of ensuring the protection of student records? Who should be responsible for this?

   - As a minimum, consideration should be given to applying similar mechanisms and provisions as those in place for the Private Vocational Schools in Ontario.

Appendix 1

Middle States Association Standards for Accreditation

While the characteristics of accredited educational institutions depend largely on the type of institution, all accredited institutions possess important common attributes. These common characteristics of excellence are the standards by which the Commission on Higher Education determines an institution's accreditation:

- integrity in the institution's conduct of all its activities through humane and equitable policies dealing with students, faculty, staff, and other constituencies;
- clearly stated mission and goals appropriate to the institution's resources and the needs of its constituents;
- clearly stated admissions and other student policies appropriate to the mission, goals, programs, and resources of the institution;
- student services appropriate to the educational, personal, and career needs of the students;
- faculty whose professional qualifications are appropriate to the mission and programs of the institution, who are committed to intellectual and professional development, and who form an adequate core to support the programs offered;
- programs and courses which develop general intellectual skills such as the ability to form independent judgment, to weigh values, to understand fundamental theory, and to interact effectively in a culturally diverse world;
- curricula which provide, emphasize, or rest upon education in the arts and sciences, even when they are attuned to professional or occupational requirements;
- library/learning resources and services sufficient to support the programs offered and evidence of their use;
- policies and procedures, qualitative and quantitative, as appropriate, which lead to the effective assessment of institutional, program, and student learning outcomes;
- ongoing institutional self-study and planning aimed at increasing the institution's effectiveness;
- financial resources sufficient to assure the quality and continuity of the institution's programs and services;
- organization, administration, and governance which facilitate teaching, research, and learning and which foster their improvement within a framework of academic freedom;
- a governing board actively fulfilling its responsibilities of policy and resource development
- physical facilities that meet the needs of the institution's programs and functions;
- honesty and accuracy in published materials and in public and media relations; and responsiveness to the need for institutional change and renewal appropriate to institutional mission, goals, and resources.